# IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS MARSHALL DIVISION

TQ DELTA, LLC,	§	
Plaintiff,	8	
	8	JURY TRIAL DEMANDED
V.	§	
	§	
COMMSCOPE HOLDING COMPANY,	§	
INC., COMMSCOPE INC., ARRIS US	§	
HOLDINGS, INC., ARRIS SOLUTIONS,	§	
INC., ARRIS TECHNOLOGY, INC., and	§	Civil Action 2:21-cv-310-JRG
ARRIS ENTERPRISES, LLC,	§	(Lead Case)
Defendants.	§	
	§	
	§	

# PLAINTIFF TQ DELTA, LLC'S UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE BILL OF COSTS

The deadline to submit Plaintiff TQ Delta, LLC's Bill of Costs is May 17, 2023, following the Court's entry of Final Judgment on May 3, 2023. *See* Dkt. 513. TQ Delta respectfully requests a seven-day extension in view of the following.

TQ Delta has now served the CommScope Defendants' counsel with a proposed Bill of Costs and supporting documentation. The parties intend to meet and confer regarding any disputes and believe that some additional time will allow the parties to substantially reduce or eliminate any remaining disputes concerning TQ Delta's Bill of Costs, before finalizing the submissions to the Court.

Accordingly, TQ Delta respectfully requests a seven-day extension of time, until and including May 24, 2023, to file the Bill of Costs.

The CommScope Defendants do not oppose the relief requested in this Motion and agree that an extension is appropriate for the parties to further confer regarding any remaining disputes.

Dated: May 17, 2023 Respectfully submitted,

#### /s/ Peter J. McAndrews

William E. Davis, III Texas State Bar No. 24047416 bdavis@davisfirm.com

Christian J. Hurt Texas State Bar No. 24059987 churt@davisfirm.com

Rudolph "Rudy" Fink IV Texas State Bar No. 24082997 rfink@davisfirm.com

Ty Wilson Texas State Bar No. 24106583 twilson@davisfirm.com

### THE DAVIS FIRM PC

213 N. Fredonia Street, Suite 230 Longview, Texas 75601 Telephone: (903) 230-9090 Facsimile: (903) 230-9661

Peter J. McAndrews (*Pro hac vice*) pmcandrews@mcandrewsip.com

Rajendra A. Chiplunkar (*Pro hac vice*) rchiplunkar@mcandrewsip.com

Ashley Ratycz (*Pro hac vice*) aratycz@mcandrews-ip.com

MCANDREWS, HELD & MALLOY, LTD. 500 West Madison St., 34<sup>th</sup> Floor Chicago, IL 60661

Telephone: (312) 775-8000 Facsimile: (312) 775-8100

ATTORNEYS FOR PLAINTIFF TQ DELTA, LLC

## **CERTIFICATE OF SERVICE**

The undersigned certifies that the foregoing document is being filed electronically in compliance with Local Rule CV-5(a). As such, this document is being served this May 17, 2023, on all counsel of record, each of whom is deemed to have consented to electronic service. L.R. CV-5(a)(3)(A).

/s/ Peter J. McAndrews
Peter J. McAndrews

#### **CERTIFICATE OF CONFERENCE**

The undersigned hereby certifies that counsel for the parties met and conferred on May 16, 2023, with regard to this motion, and that the CommScope Defendants do not oppose the relief sought in this motion.

/s/ Peter J. McAndrews
Peter J. McAndrews